

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF ILLINOIS

|                                  |   |                                |
|----------------------------------|---|--------------------------------|
| TIMOTHY OWENS and SHELLEY OWENS, | ) |                                |
|                                  | ) |                                |
| Plaintiffs,                      | ) |                                |
|                                  | ) |                                |
| v.                               | ) | Case No. 3:16-CV-01009-JPG-RJD |
|                                  | ) |                                |
| PRAIRIE STATE GENERATING COMPANY | ) |                                |
|                                  | ) |                                |
| Defendant.                       | ) |                                |

**DEFENDANT'S RESPONSE TO PLAINTIFF TIMOTHY OWENS'**  
**REQUEST FOR ADMISSIONS**

Defendant Prairie State Generating Company ("Prairie State") for its Response to Plaintiff Timothy Owens' Requests for Admissions, in accordance with Rule 36 of the Federal Rules of Civil Procedure, states as follows:

**REQUESTS**

1. Admit that Timothy Owens was hospitalized as an inpatient at Center Pointe Hospital, 4801 Weldon Spring Parkway, St. Charles, MO 63304 with an admission date of October 10, 2014 and a discharge date of October 22, 2014 for treatment of a serious medical condition.

**Response:** Defendant admits that Timothy Owens was hospitalized as an inpatient at CenterPointe Hospital, 4801 Weldon Spring Parkway, St. Charles, MO 63304 with an admission date of October 10, 2014 and a discharge date of October 22, 2014 for rehabilitation of a Vicodin addiction (according to his FMLA certification). Defendant denies the remainder of this request.

2. Admit at the date Timothy Owens was granted FMLA leave he suffered a serious medical condition.

**Response:** Defendant admits it approved Mr. Owens' request for FMLA leave on September 23, 2014 in connection with his doctor's certification that leave was needed for Mr.

Owens to rehabilitate from Vicodin addiction, which can be a serious health condition under FMLA. Defendant denies the remainder of this request.

Respectfully submitted,

HESSE MARTONE, P.C.

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Dated: May 4, 2017.

*Attorneys for Defendant Prairie State  
Generating Company*

**CERTIFICATE OF SERVICE**

The undersigned certifies service of the foregoing document on May 4, 2017 by electronic mail, to:

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/s/ Matthew B. Robinson